

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Vernon Allen ) Chapter 13  
Debtor(s) ) Case No. 21 B 12551  
 ) Judge A. Benjamin Goldgar

## Notice of Motion

Vernon Allen  
1042 Bohland Ave  
Bellwood, IL 60104

Debtor Attorney: David Freydin Ltd  
via Clerk's ECF noticing procedures

On January 25, 2022 at 2:30 pm, I will appear before the Honorable A. Benjamin Goldgar, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <<https://www.zoomgov.com/>>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 319 7225 and the password is 584922. The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Thursday, January 13, 2022.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

## **Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 11/02/2021.
2. The debtor(s) have failed to provide an Affidavit of Compliance .
3. The debtor(s) have failed to attend two scheduled §341(a) meetings of the creditors

4. The debtor(s) have failed to provide required identification and or social security documentation .
5. The debtor(s) have failed to file a feasible plan. The proposed plan now runs 70 months.
6. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay .

WHEREFORE, the Trustee prays that this case be dismissed , and for any and all other relief this court deems just and proper .

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE